

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

1201 NORTH MARKET STREET  
P.O. BOX 1347  
WILMINGTON, DELAWARE 19899-1347  

---

(302) 658-9200

**MICHAEL J. FLYNN**  
(302) 351-9661  
mflynn@morrisnichols.com

April 5, 2021

*VIA ELECTRONIC FILING*

The Honorable Leonard P. Stark  
J. Caleb Boggs Federal Building  
844 King Street, Unit 26, Room 6124  
Wilmington, DE 19801-3556

Re: *Thomson Reuters Enterprise Centre GmbH v. ROSS Intelligence Inc.*,  
C.A. No. 20-613-LPS

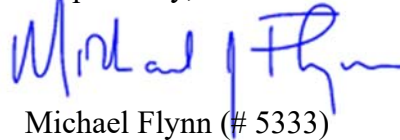
Dear Chief Judge Stark:

We are counsel for Plaintiffs Thomson Reuters Enterprise Centre GmbH and West Publishing Corp. Pursuant to Your Honor's March 29, 2021 Order (D.I. 32), we provide this joint status report, along with counsel for Defendant ROSS Intelligence Inc.

The parties have met and conferred, and they agree that this case should proceed on Plaintiffs' copyright infringement and tortious interference claims (Counts I–II) and Defendant's related counterclaims (Counterclaims I–V). Because Plaintiffs have moved to dismiss Defendant's antitrust and unfair competition counterclaims (D.I. 27), the parties also agree that discovery should not commence with regard to those counterclaims at this time (Counterclaims VI–IX).

Accordingly, subject to the Court's approval, the parties respectfully suggest that, by April 19, 2021, they submit for the Court's consideration a proposed scheduling order consistent with their agreement.

Respectfully,



Michael Flynn (# 5333)

cc: All counsel of record